



**Hiland Partners
Holdings LLC**
a Kinder Morgan company

Submitted Excel Spreadsheet via EPA CEDRI

July 25, 2019

Mr. Eddie Sierra
U.S. EPA Region 8
1595 Wynkoop Street
Mail Code 8ENF – AT
Denver, CO 80202-1129

**RE: Badlands Gas Plant
 Permit Number: O99007
 NSPS OOOOa Semi-annual Report January 1, 2019 through June 30, 2019**

Dear Mr. Sierra:

Hiland Partners Holdings LLC (Hiland) is submitting the enclosed Semi-annual Monitoring Report as required by 40 CFR 60 Subpart OOOOa and 7.L of permit number O99007. The monitoring report covers the semi-annual period from January 1, 2019 through June 30, 2019.

The *Part 60 Subpart OOOOa – 60.5422.a(a) Spreadsheet Template* was sent via CEDRI but the database would not accept a PDF of this letter with the Semi-Annual Report Summary and Delay of Repair History forms. The information used to compile the reporting requirements are provided by the LDAR contractor, TEAM Industrial Services.

If you need additional information or have any questions please contact me at (713) 420-6225 or by email at Anu_Pundari@KinderMorgan.com.

Sincerely,

(b) (6)

Anu Pundari
Sr. Engineer – EHS Staff

Attachments:

- Badlands Semiannual Report Cover Letter
- OOOOa Delay of Repair report
- OOOOa Semi-Annual Report Jan-June 2019
- Badlands Part 60 Subpart OOOOa – 60.5422a(a) Semiannual Report Template (CEDRI submittal)

Cc:

FEDEX 7886 9134 0927

Mr. Russell Martin

North Dakota Dept of Environmental Quality

918 E. Divide Ave., 2nd Floor

Bismarck, ND 58501

FedEx 7850 6938 7457

NSPS 0000a
DELAY OF REPAIR

Facility: KINDER MORGAN - BADLANDS GAS PLANT

Regulation: EPA60-0000a

Unit: 1. INLET (0000a)

Repair Delayed History

Reporting Period: 1/1/2019 to 6/30/2019

Print Date: 7/16/2019 5:19:20PM

Tag #	Class	Stream & Description	Location	Inspect Date	Inspect ppm	Unit SD	Date on Delay	Reason For Delay	Approved By	Expected Repair Date	Removed From Delay
0046BA	VALVE	INLET GAS INLET GAS	IN HP INLET METER BLDG.	11/11/2018	1,409	Yes	1/3/2019	Repair is technically infensible without a process unit shutdown. Repair of this equipment shall occ	AUTHORIZED BY PLANT ON 11-11-18 LEAK LOG	9/30/2019	

Total Components on Delay During Reporting Period for 1. INLET (0000a): 1

(b) (6)

Signature of Owner or Operator Responsible for Delay of Repair Decision

Repair Delayed History

Reporting Period: 1/1/2019 to 6/30/2019

Print Date: 7/16/2019 5:19:20PM

Facility: KINDER MORGAN - BADLANDS GAS PLANT

Regulation: EPA60-0000a

Unit: 4. NITROGEN REJECTION & FRACTIONATION (0000a)

Tag #	Class	Stream & Description	Location	Inspect Date	Inspect ppm	Unit SD	Date on Delay	Reason For Delay	Approved By	Expected Repair Date	Removed From Delay
0481P.11	CONECT	PROPANE PROPANE	IN PROCESS BLDG ON S.E. SIDE, W. OF 32-803 PROPANE SUCT SCRUB, ON 1" REF PROP MAKEUP LINE OVHD	4/20/2019	3,946	Yes	4/23/2019	Refridgeration system has to be blown down	Kevin McKittrick	9/16/2019	
0481P.12	CONECT	PROPANE PROPANE	IN PROCESS BLDG ON S.E. SIDE, W. OF 32-803 PROPANE SUCT SCRUB, ON 1" REF PROP MAKEUP LINE OVHD	4/20/2019	4,191	Yes	4/23/2019	Refridgeration system has to be blown down	Kevin McKittrick	9/16/2019	
0511.16	CONECT	PROPANE PROPANE	N. OF PROCESS BLDG, ON E. SIDE OF 32-804 PROPANE ACCUMULATOR	4/20/2019	16,095	Yes	4/23/2019	Plant has to be blown down	Kevin McKittrick	9/16/2019	
0439	VALVE	PROPANE PROPANE	IN PROCESS BLDG ON S.W. SIDE, ON S.W. END OF SKID, ON C3 TO STORAGE LINE	4/28/2019	2,363	Yes	5/3/2019	Cannot be repaired without a shutdown.	Leak log.	8/20/2019	

Total Components on Delay During Reporting Period for 4. NITROGEN REJECTION & FRACTIONATION (0000a): 12.

(b) (6)

Signature of Owner or Operator Responsible for Delay of Repair Decision

NSPS 0000a
SEMIANNUAL LDAR REPORT

Semiannual Equipment Leak/VOC Monitoring Report pursuant to NSPS OOOOa

This report is being submitted to meet the requirements in 40 CFR 60, Subpart OOOOa, *Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015*. This report covers the period from January 1, 2019 through June 30, 2019. Below is the specific information required by §60.5422a(a) and (c).

Reporting Period: January 1, 2019 through June 30, 2019

Inlet Process Unit [60.487a(c)(1)]		First Half 2019					
Citation		Jan	Feb	March	April	May	June
Valves – Gas Vapor/Light Liquid							
60.487a(c)(2)(i)	Leak count	2	2	2	2	0	0
60.487a(c)(2)(ii)	Repaired Late	0	0	0	0	0	0
Pumps – Light Liquid							
60.487a(c)(2)(iii)	Leak Count	0	0	0	0	0	0
60.487a(c)(2)(iv)	Repaired Late	0	0	0	0	0	0
Pressure Relief Devices – Gas Vapor/Light Liquid							
60.5422(c)(1)	Leak Count	0	0	0	0	0	0
60.5422(c)(2)	Repaired late	0	0	0	0	0	0
Connectors							
60.5422(a) & 60.487a(c)(2)(vii)	Leak Count	0	0	0	0	0	0
60.5422(a) & 60.487a(c)(2)(viii)	Repaired late	0	0	0	0	0	0

Nitrogen Rejection & Fractionation Unit [60.487a(c)(1)]		First Half 2019					
Citation		Jan	Feb	March	April	May	June
Valves – Gas Vapor/Light Liquid							
60.487a(c)(2)(i)	Leak count	1	0	0	1	0	0
60.487a(c)(2)(ii)	Repaired Late	0	0	0	1	0	0
Pumps – Light Liquid							
60.487a(c)(2)(iii)	Leak Count	0	0	0	0	0	0
60.487a(c)(2)(iv)	Repaired Late	0	0	0	0	0	0
Pressure Relief Devices – Gas Vapor/Light Liquid							
60.5422(c)(1)	Leak Count	0	0	0	0	0	0
60.5422(c)(2)	Repaired late	0	0	0	0	0	0

Nitrogen Rejection & Fractionation Unit [60.487a(c)(1)]		First Half 2019					
Citation		Jan	Feb	March	April	May	June
Connectors							
60.5422(a) & 60.487a(c)(2)(vii)	Leak Count	0	0	0	59	0	0
60.5422(a) & 60.487a(c)(2)(viii)	Repaired late	0	0	0	3	0	0

Storage & Loading [60.487a(c)(1)]		First Half 2019					
Citation		Jan	Feb	March	April	May	June
Valves – Gas Vapor/Light Liquid							
60.487a(c)(2)(i)	Leak count	1	2	1	1	1	0
60.487a(c)(2)(ii)	Repaired Late	0	0	0	0	0	0
Pumps – Light Liquid							
60.487a(c)(2)(iii)	Leak Count	0	0	0	0	0	0
60.487a(c)(2)(iv)	Repaired Late	0	0	0	0	0	0
Pressure Relief Devices – Gas Vapor/Light Liquid							
60.5422(c)(1)	Leak Count	0	0	0	0	0	0
60.5422(c)(2)	Repaired late	0	0	0	0	0	0
Connectors							
60.5422(a) & 60.487a(c)(2)(vii)	Leak Count	0	0	0	41	0	0
60.5422(a) & 60.487a(c)(2)(viii)	Repaired late	0	0	0	0	0	0

Flare System [60.487a(c)(1)]		First Half 2019					
Citation		Jan	Feb	March	April	May	June
Valves – Gas Vapor/Light Liquid							
60.487a(c)(2)(i)	Leak count	0	0	0	0	0	0
60.487a(c)(2)(ii)	Repaired Late	0	0	0	0	0	0
Pumps – Light Liquid							
60.487a(c)(2)(iii)	Leak Count	0	0	0	0	0	0
60.487a(c)(2)(iv)	Repaired Late	0	0	0	0	0	0
Pressure Relief Devices – Gas Vapor/Light Liquid							
60.5422(c)(1)	Leak Count	0	0	0	0	0	0
60.5422(c)(2)	Repaired late	0	0	0	0	0	0

Flare System [60.487a(c)(1)]		First Half 2019					
Citation		Jan	Feb	March	April	May	June
Connectors							
60.5422(a) & 60.487a(c)(2)(vii)	Leak Count	0	0	0	0	0	0
60.5422(a) & 60.487a(c)(2)(viii)	Repaired late	0	0	0	0	0	0

Reporting per 60.487a(c)(2)(xi)

See attached Delay of Repair History Report.

Reporting per 60.487a(c)(3)

The natural gas wells feeding the natural gas plant shut down. Therefore, the entire gas plant shutdown on June 14, 2019 except the Refrigeration System that shutdown on July 24, 2019.

Reporting per 60.487a(c)(4)

Reportable Inventory Components	Previous Period Ending 1/31/2019	Current Period Ending 6/30/2019
Valves (Excluding no detectable emissions) (60.487a(b)(2))	1,098	1,126
Pumps (excluding dual-seal and closed vent) (60.487a(b)(3))	13	12
Compressors (60.487a(b)(4))	2	2
Connectors (60.487a(b)(5))	2,769	5,249
PRV's that vent to atmosphere (60.5422(a) & 60.5401(b))	0	0